

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

ROBERT WILSON	x Civil Action No.:
62 E. Johnson Street	:
Apartment 2	:
Philadelphia, PA 19144	:
	:
Plaintiff,	:
	:
v.	:
	:
BUCKLEY & COMPANY, INC. d/b/a	:
BUCKLEY & COMPANY	:
3401 Moore Street	:
Philadelphia, PA 19145	:
	:
and	:
	:
CITY OF PHILADELPHIA	:
1515 Arch Street, 14 <sup>th</sup> Floor	:
Philadelphia, PA 19103	:
	:
and	:
	:
COMMONWEALTH OF PENNSYLVANIA	:
DEPARTMENT OF TRANSPORTATION	:
Blaine & Ruffner Streets	:
Philadelphia, PA 19140	:
	:
and	:
	:
AMTRAK c/o NATIONAL RAILROAD	:
PASSENGER CORPORATION, CLAIMS	:
DEPT.	:
30 <sup>th</sup> Street Station	:
30 <sup>th</sup> and Market Streets	:
Philadelphia, PA 19104	:
	:
Defendants.	:
	x

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1441(a),

defendant National Railroad Passenger Corporation ("Amtrak") hereby removes to the United States District Court for the Eastern District of Pennsylvania the case captioned Robert Wilson v. Buckley & Company, Inc. d/b/a Buckley & Company, City of Philadelphia, Commonwealth of Pennsylvania Department of Transportation, and National Railroad Passenger Corporation ("Amtrak"), July Term, 2013, No. 3230, Philadelphia County Court of Common Pleas, and as grounds for removal states as follows:

1. Amtrak has been named as a defendant in an action now pending in the Court of Common Pleas, Philadelphia County, July Term 2013, No. 3230.
2. The above-referenced action was commenced by the filing of a Complaint on July 24, 2013. (See Complaint at Exhibit A).
3. Amtrak first received a copy of the Complaint when it was delivered to Amtrak's Philadelphia claims office on August 9, 2013. (See Exhibit A).
4. This Notice is being filed within 30 days of receipt of the Complaint by Amtrak.
5. The United States District Court for the Eastern District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Amtrak was created by an Act of Congress, 49 U.S.C. § 29101 et seq., and more than half of its corporate stock is owned by the federal government. See 28 U.S.C. § 1349. As such, this case is removable to this Court pursuant to

28 U.S.C. § 1441(a).

6. Pursuant to 28 U.S.C. § 1446(a), all defendants who have been served with the Complaint consent to removal of this action to this Court.

7. Defendant City of Philadelphia first received a copy of the Complaint on or about August 1, 2013.

8. The City of Philadelphia has consented to Amtrak's removal of this action to the Eastern District of Pennsylvania. A copy of the City of Philadelphia's Consent to Removal is attached hereto as Exhibit B.

9. The Philadelphia County docket sheet does not reflect service of the Complaint on defendants Buckley & Company, Inc. or the Commonwealth of Pennsylvania Department of Transportation ("PennDOT"), nor has anyone entered an appearance for these defendants. (See Exhibit C).

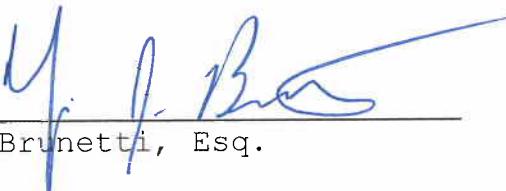
10. Neither Buckley & Company, Inc.'s nor PennDOT's consent to removal is required in this case because they have not yet been served with the Complaint.

11. Pursuant to 28 U.S.C. § 1446(a), copies of all pleadings served upon defendant Amtrak are attached hereto at Exhibit A.

WHEREFORE, Amtrak requests that the action described herein now pending in the Court of Common Pleas, Philadelphia County, be removed to this Court.

LANDMAN CORSI BALLAINE & FORD P.C.  
Attorneys for Defendant  
National Railroad Passenger  
Corporation ("Amtrak")

BY:

  
Yuri J. Brunetti, Esq.

Dated: August 13, 2013

# **EXHIBIT A**

Court of Common Pleas of Philadelphia County  
Trial Division  
**Civil Cover Sheet**

		For Prothonotary Use Only (Docket Number)	
		<b>JULY 2013</b> <b>003230</b>	
		E-Filing Number: 1307041733	
PLAINTIFF'S NAME ROBERT WILSON		DEFENDANT'S NAME BUCKLEY & COMPANY, INC., ALIAS: D/B/A BUCKLEY & COMPANY	
PLAINTIFF'S ADDRESS 62 E. JOHNSON STREET APARTMENT 2 PHILADELPHIA PA 19144		DEFENDANT'S ADDRESS 3401 MOORE STREET PHILADELPHIA PA 19145	
PLAINTIFF'S NAME <i>DIVISION MANAGER CLAIMS SERVICES AUG 09 2013</i>		DEFENDANT'S NAME CITY OF PHILADELPHIA	
PLAINTIFF'S ADDRESS <i>PHILADELPHIA, PA via hand delivery Ra</i>		DEFENDANT'S ADDRESS 1515 ARCH STREET, 14TH FLOOR PHILADELPHIA PA 19103	
PLAINTIFF'S NAME <i>via hand delivery Ra</i>		DEFENDANT'S NAME COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF TRANSPORTATION	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS BLAINE & RUFFNER STREETS PHILADELPHIA PA 19140	
TOTAL NUMBER OF PLAINTIFFS 1		TOTAL NUMBER OF DEFENDANTS 4	
		COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00		COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Commerce <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Other: <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> Settlement <input type="checkbox"/> <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival	
CASE TYPE AND CODE 2S - PREMISES LIABILITY, SLIP/FALL			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) <b>FILED PRO PROTHY</b> <b>JUL 24 2013</b> <b>J. OSTROWSKI</b>			IS CASE SUBJECT TO COORDINATION ORDER? YES      NO
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>ROBERT WILSON</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY BRUCE M. GINSBURG		ADDRESS 2112 WALNUT STREET PHILADELPHIA PA 19103	
PHONE NUMBER (215) 564-4400	FAX NUMBER (215) 564-4585		
SUPREME COURT IDENTIFICATION NO. 22187		E-MAIL ADDRESS bginsburg@ginsburg-law.com	
SIGNATURE OF FILING ATTORNEY OR PARTY BRUCE GINSBURG		DATE SUBMITTED Wednesday, July 24, 2013, 03:25 pm	

**COMPLETE LIST OF DEFENDANTS:**

1. AMTRAK  
C/O NATIONAL RAILROAD 30TH & MARKET STREETS  
PHILADELPHIA PA 19104
2. COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF TRANSPORTATION  
BLAINE & RUFFNER STREETS  
PHILADELPHIA PA 19140
3. CITY OF PHILADELPHIA  
1515 ARCH STREET, 14TH FLOOR  
PHILADELPHIA PA 19103
4. BUCKLEY & COMPANY, INC.  
ALIAS: D/B/A BUCKLEY & COMPANY  
3401 MOORE STREET  
PHILADELPHIA PA 19145

**GINSBURG & ASSOCIATES**  
 BRUCE MARTIN GINSBURG, ESQUIRE  
 IDENTIFICATION NO: 22187  
 2112 WALNUT STREET  
 PHILADELPHIA, PA 19103  
 (215) 564-4400

**MAJOR CASE -  
 JURY TRIAL DEMANDED**

3112877447  
*Filed and Attested by*  
 PROTHONOTARY  
 24 JUL 2013 03:25 PM  
 J. OSTROWSKI  
 DISTRICT OF PA

ATTORNEYS FOR PLAINTIFF

ROBERT WILSON :  
 62 E. Johnson Street, Apt 2 :  
 Philadelphia, PA 19144 :  
 Plaintiff, :

v. :

BUCKLEY & COMPANY, INC. :  
 d/b/a BUCKLEY & COMPANY :  
 3401 Moore Street :  
 Philadelphia, PA 19145 :  
 and  
 CITY OF PHILADELPHIA :  
 1515 Arch Street, 14th Floor :  
 Philadelphia, PA 19103 :  
 and  
 COMMONWEALTH OF :  
 PENNSYLVANIA DEPARTMENT OF :  
 TRANSPORTATION :  
 Blaine & Ruffner Streets :  
 Philadelphia, PA 19140 :  
 and  
 AMTRAK :  
 c/o NATIONAL RAILROAD PASSENGER :  
 CORPORATION, CLAIMS DEPT. :  
 30th Street Station :  
 30th and Market Streets :  
 Philadelphia, PA 19104 :  
 Defendants. :

You have been sued in court. If you wish to defend against the claims set forth in the following pages. You must take action within (20) days after this Complaint and notice are served by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA COUNTY BAR ASSOCIATION  
LAWYER REFERRAL AND INFORMATION SERVICE  
1 READING CENTER  
PHILADELPHIA, PENNSYLVANIA 19107  
215-238-1701

AVISO

Le han demandado a usted en is corte. Si usted quiere defendarse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazao al partir de la fecha de esto demando y la notificacion. Hace falta asentar una comparencia escrita un persona a con un abogado y entregar a la cortin forma escrita sus defensas o sus objectiones a las demandas en contra de su persona. Sea avisado que si usted no se defienda, la corte tomara medidas y puede continuar la demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIAMENTE SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICO, VAYA EN CUYA DIRECION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE FILADELFIA  
SERVICIO DE REFERENCIAL LEGAL  
One Reading Center Filadelfia,  
Pennsylvania 19107  
(215) 238-1701

**GINSBURG & ASSOCIATES**  
BRUCE MARTIN GINSBURG, ESQUIRE  
IDENTIFICATION NO: 22187  
2112 WALNUT STREET  
PHILADELPHIA, PA 19103  
(215) 564-4400

**MAJOR CASE -**  
**JURY TRIAL DEMANDED**

**ATTORNEYS FOR PLAINTIFF**

ROBERT WILSON :  
62 E. Johnson Street, Apt 2 :  
Philadelphia, PA 19144 :  
Plaintiff, :  
v. :  
BUCKLEY & COMPANY, INC. :  
d/b/a BUCKLEY & COMPANY :  
3401 Moore Street :  
Philadelphia, PA 19145 :  
and :  
CITY OF PHILADELPHIA :  
1515 Arch Street, 14th Floor :  
Philadelphia, PA 19103 :  
and :  
COMMONWEALTH OF :  
PENNSYLVANIA DEPARTMENT OF :  
TRANSPORTATION :  
Blaine & Ruffner Streets :  
Philadelphia, PA 19140 :  
and :  
AMTRAK :  
c/o NATIONAL RAILROAD PASSENGER :  
CORPORATION, CLAIMS DEPT. :  
30th Street Station :  
30th and Market Streets :  
Philadelphia, PA 19104 :  
Defendants. :  
1. Plaintiff, ROBERT WILSON , is an adult individual residing at the above listed address.

**COURT OF COMMON PLEAS**  
**PHILADELPHIA COUNTY**

**JULY TERM, 2013**  
No:

**COMPLAINT – CIVIL ACTION**  
**PREMISES LIABILITY**

1. Plaintiff, ROBERT WILSON , is an adult individual residing at the above listed address.

2. Defendant, BUCKLEY & COMPANY, INC., d/b/a BUCKLEY & COMPANY (hereinafter "BUCKLEY") is a corporation or other legal entity organized and existing under and by virtue of the laws of the State of Pennsylvania, which regularly advertises, seeks customers, purchases goods and services, and/or conducts business in Philadelphia County, Pennsylvania, with an office for service located at the above listed address.

3. At all times material hereto, Defendant, BUCKLEY, acted by and through their duly authorized agents, ostensible agents, employees, workmen, and servants, all of whom were working in furtherance of the interests of the municipal defendant herein, BUCKLEY.

4. Defendant, CITY OF PHILADELPHIA, (hereinafter "CITY"), is a municipal corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with an office for service located at 1515 Arch Street, 14<sup>th</sup> Floor, Philadelphia, PA 19103.

5. At all times material hereto, Defendant, CITY, acted by and through their duly authorized agents, ostensible agents, employees, workmen, and servants, all of whom were working in furtherance of the interests of the municipal defendant herein, CITY.

6. Defendant, COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF TRANSPORTATION, (hereinafter "PENNDOT"), is a Commonwealth agency organized and existing under the laws of the Commonwealth of Pennsylvania, with an office for service located at Blaine & Ruffner Streets, Philadelphia, PA 19140.

7. At all times material hereto, Defendants, PENNDOT, acted by and through their duly authorized agents, ostensible agents, employees, workmen, and servants, all of whom were working in furtherance of the interests of the defendant herein, PENNDOT.

8. Defendant, AMTRAK, is a corporation, organized and existing under and by virtue of the laws of the Commonwealth of Pennsylvania, which regularly advertises, seeks customers and/or conducts business in Philadelphia County, with a registered office for service located at c/o NATIONAL RAILROAD PASSENGER CORPORATION, CLAIMS DEPT., 30th Street Station, 30th and Market Streets, Philadelphia, PA 19104.

9. At all times material to this Complaint, Defendant, AMTRAK, acted or failed to act by their agents, servants, workmen and/or employees, who were then and there acting within the scope of their authority and course of their employment with Defendant, AMTRAK, in furtherance of Defendant's business and on behalf of the Defendant, AMTRAK.

10. At all times material to this Complaint, Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, owned, operated, managed and/or controlled the property located at 30<sup>th</sup> Street Station, 30<sup>th</sup> and Market Streets, Philadelphia, PA 19104.

11. Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, were responsible for the proper maintenance of the aforesaid premises and to keep said premises safe for those lawfully upon the premises and/or stairway.

12. On or about October 3, 2011, Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, so carelessly and/or negligently allowed a dangerous and defective condition, consisting an unsafe, defective and/or raised asphalt, otherwise unprotected or unmarked, to exist and remain on the premises located at 30<sup>th</sup> Street Station, 30<sup>th</sup> and Market Streets, Philadelphia, PA 19104.

13. On or about October 3, 2011, while a business invitee at the above mentioned premises, Plaintiff, ROBERT WILSON, came into contact with said dangerous condition, consisting of unsafe, defective and raised sidewalk, otherwise unprotected and/or unmarked,

causing Plaintiff to fall and suffer injuries which form the basis of this action.

14. The aforesaid accident was due solely to the negligence and/or carelessness of Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, acting as aforesaid, and was due in no manner whatsoever to any act or failure to act on the part of the Plaintiff, ROBERT WILSON.

**COUNT I – NEGLIGENCE**  
**ROBERT WILSON vs. BUCKLEY and CITY and PENNDOT and AMTRAK**

15. Plaintiff, ROBERT WILSON, hereby incorporates paragraph by reference all of the paragraphs set forth above as though fully set forth at length herein.

16. The negligence and/or carelessness of Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, acting aforesaid, consisted of the following:

- a. Allowing and causing a dangerous and defective condition to exist at the aforesaid location, of which Defendants knew or should have known by the exercise of reasonable care;
- b. Failing to remove said dangerous condition of which Defendants knew or should have known and which constituted a danger to persons lawfully walking thereon;
- c. Failing to correct said dangerous condition of which Defendants knew or should have known and which constituted a danger to persons lawfully walking thereon;
- d. Failing to keep and maintain the aforesaid premises in a reasonably safe condition;
- e. Failing to provide and maintain an unobstructed and safe route of travel for Plaintiff;
- f. Failing to barricade or otherwise contain the area where said dangerous condition existed;
- g. Failing to warn persons on the premises of the existence of said dangerous condition of which Defendants knew or should have known;
- h. Disregarding the rights and safety of the Plaintiff; and

i. Failing to exercise due care under the circumstances.

17. As a result of this accident, Plaintiff, ROBERT WILSON, has suffered injuries which are or may be serious and permanent in nature, including but not limited to injuries to his shoulder, wrist, back and knees and neck, including disc herniations at C2/3 and C3/4, as well as other injuries as may be diagnosed by Plaintiff's health care providers, all of which injuries have in the past, and may in the future, cause Plaintiff great pain and suffering.

18. As a further result of this accident, Plaintiff, ROBERT WILSON, has been or will be required to receive and undergo medical attention and care and to expend various sums of money and to incur various expenses and may be required to continue to expend such sums or incur such expenditures for an indefinite time in the future.

19. As a further result of this accident, Plaintiff, ROBERT WILSON, has suffered medically determinable physical and/or mental impairment which prevents the Plaintiff from performing all or substantially all of the material acts and duties which constituted the Plaintiff's usual and customary activities prior to the accident.

20. As a direct and reasonable result of the aforementioned accident, Plaintiff, ROBERT WILSON, has or may hereafter incur other financial expenses which do or may exceed amounts which Plaintiff may otherwise be entitled to recover.

21. As a further result of the accident aforementioned, Plaintiff, ROBERT WILSON, has suffered severe physical pain, mental anguish and humiliation, and may continue to suffer same for an indefinite time in the future.

WHEREFORE, Plaintiff, ROBERT WILSON, demands judgment against Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, in excess of Fifty Thousand (\$50,000.00) Dollars, plus interest and costs.

GINSBURG & ASSOCIATES

By:

  
BRUCE MARTIN GINSBURG  
Attorney for Plaintiff

**VERIFICATION**

Plaintiff verifies that the statements made in this pleading are true and correct to the best of plaintiff's knowledge, information and belief. To the extent that the pleading contains averments of law and language of counsel and results of investigation, plaintiff has relied on counsel. Plaintiff understands that false statements herein are made subject to penalties of 18 Pa. §4904, relating to unsworn falsification to authorities.

Robert E. Wilson

## **EXHIBIT B**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

ROBERT WILSON

x Civil Action No.:

Plaintiff,

v.

BUCKLEY & COMPANY, INC. d/b/a  
BUCKLEY & COMPANY

and

CITY OF PHILADELPHIA

and

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION

and

AMTRAK c/o NATIONAL RAILROAD  
PASSENGER CORPORATION

Defendants.

x

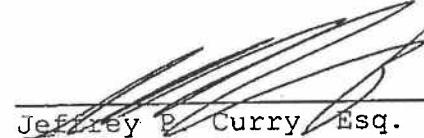
CONSENT TO REMOVAL

1. The City of Philadelphia has been named as a defendant in the action entitled Robert Wilson v. Buckley & Company, Inc. D/b/a Buckley & Company, City of Philadelphia, Commonwealth of Pennsylvania Department of Transportation, and National Railroad Passenger Corporation ("Amtrak"), now pending in the Philadelphia Court of Common Pleas, No. 003230, July 2013 Term.

2. The City of Philadelphia was first served with a copy of the Complaint on or about August 1, 2013.

3. The City of Philadelphia hereby consents to and joins in

the removal of this action to the United States District Court for the Eastern District of Pennsylvania.

BY: 

Jeffrey P. Curry, Esq.  
Attorney for Defendant  
The City of Philadelphia

Dated:

8/13/2013

# **EXHIBIT C**



### Case Description

**Case ID:** 130703230  
**Case Caption:** WILSON VS BUCKLEY & COMPANY, INC. ETAL  
**Filing Date:** Wednesday, July 24th, 2013  
**Court:** MAJOR JURY-STANDARD  
**Location:** City Hall  
**Jury:** JURY  
**Case Type:** PREMISES LIABILITY, SLIP/FALL  
**Status:** WAITING TO LIST CASE MGMT CONF

### Related Cases

No related cases were found.

### Case Event Schedule

No case events were found.

### Case motions

No case motions were found.

### Case Parties

Seq #	Assoc	Expn Date	Type	Name
1			ATTORNEY FOR PLAINTIFF	GINSBURG, BRUCE M
	Address: 2112 WALNUT STREET PHILADELPHIA PA 19103 (215)564-4400	Aliases:	none	
2	1		PLAINTIFF	WILSON, ROBERT
	Address: 62 E. JOHNSON STREET APARTMENT 2	Aliases:	none	

PHILADELPHIA  
PA 19144

3			DEFENDANT	BUCKLEY & COMPANY, INC.
<b>Address:</b>	3401 MOORE STREET PHILADELPHIA PA 19145	<b>Aliases:</b>	D/B/A BUCKLEY & COMPANY	
4	7		DEFENDANT	CITY OF PHILADELPHIA
<b>Address:</b>	1515 ARCH STREET, 14TH FLOOR PHILADELPHIA PA 19103	<b>Aliases:</b>	none	
5			DEFENDANT	COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF TRANSPORTATION
<b>Address:</b>	BLAINE & RUFFNER STREETS PHILADELPHIA PA 19140	<b>Aliases:</b>	none	
6			DEFENDANT	AMTRAK
<b>Address:</b>	C/O NATIONAL RAILROAD 30TH & MARKET STREETS PHILADELPHIA PA 19104	<b>Aliases:</b>	none	
7			ATTORNEY FOR DEFENDANT	CURRY, JEFFREY P
<b>Address:</b>	1515 ARCH STREET	<b>Aliases:</b>	none	

14TH FLOOR  
PHILADELPHIA  
PA 19102  
(215)683-5373

8			TEAM LEADER	BERNSTEIN, MARK I
<b>Address:</b> 530 CITY HALL PHILADELPHIA PA 19107 (215)686-7335		<b>Aliases:</b> <i>none</i>		

### Docket Entries

Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/Entry Date
24-JUL-2013 03:25 PM	ACTIVE CASE			24-JUL-2013 03:32 PM
<b>Docket Entry:</b>	E-Filing Number: 1307041733			
24-JUL-2013 03:25 PM	COMMENCEMENT CIVIL ACTION JURY	GINSBURG, BRUCE M		24-JUL-2013 03:32 PM
<b>Documents:</b>	<a href="#">Click link(s) to preview/purchase the documents</a> <a href="#">Final Cover</a> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 5px;"> <a href="#">Click HERE to purchase all documents related to this one docket entry</a> </div>			
<b>Docket Entry:</b>	<i>none.</i>			
24-JUL-2013 03:25 PM	COMPLAINT FILED NOTICE GIVEN	GINSBURG, BRUCE M		24-JUL-2013 03:32 PM
<b>Documents:</b>	<a href="#">Click link(s) to preview/purchase the documents</a> <a href="#">MX-3110N_20130724_150932.pdf</a> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 5px;"> <a href="#">Click HERE to purchase all documents related to this one docket entry</a> </div>			
<b>Docket Entry:</b>	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED.			
24-JUL-2013 03:25 PM	SHERIFF'S SURCHARGE 4 DEFTS	GINSBURG, BRUCE M		24-JUL-2013 03:32 PM

<b>Docket Entry:</b>	none.			
24-JUL-2013 03:25 PM	JURY TRIAL PERFECTED	GINSBURG, BRUCE M		24-JUL-2013 03:32 PM
<b>Docket Entry:</b>	8 JURORS REQUESTED.			
24-JUL-2013 03:25 PM	WAITING TO LIST CASE MGMT CONF	GINSBURG, BRUCE M		24-JUL-2013 03:32 PM
<b>Docket Entry:</b>	none.			
05-AUG-2013 01:18 PM	ENTRY OF APPEARANCE FILED	CURRY, JEFFREY P		05-AUG-2013 02:12 PM
<b>Documents:</b>	 Click link(s) to preview/purchase the documents <a href="#">Entry and Demand.pdf</a>			
<b>Docket Entry:</b>	ENTRY OF APPEARANCE OF JEFFREY P CURRY FILED. (FILED ON BEHALF OF CITY OF PHILADELPHIA)			
05-AUG-2013 01:18 PM	JURY TRIAL PERFECTED			05-AUG-2013 02:12 PM
<b>Docket Entry:</b>	12 JURORS REQUESTED.			
05-AUG-2013 01:18 PM	CITY CHARGE SUBSEQUENT FILINGS	CURRY, JEFFREY P		05-AUG-2013 02:12 PM
<b>Docket Entry:</b>	none.			
08-AUG-2013 03:32 PM	AFFIDAVIT OF SERVICE FILED			09-AUG-2013 12:38 PM
<b>Documents:</b>	 Click link(s) to preview/purchase the documents <a href="#">Affidavit of Service</a>			
<b>Docket</b>	AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON CITY OF			

**Entry: PHILADELPHIA BY PERSONAL SERVICE ON 08/01/2013 FILED.**

[Case Description](#)   [Related Cases](#)   [Event Schedule](#)   [Case Parties](#)   [Docket Entries](#)

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